

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
EVERETTE JOSEPH ROGERS :  
KARISSA MARIE ROGERS :  
Debtor :  
 :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 : CASE NO. 1-24-bk-03049  
EVERETTE JOSEPH ROGERS :  
KARISSA MARIE ROGERS :  
Respondent :

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 16<sup>th</sup> day of January 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid.
  - b. The Plan is inconsistent with Proofs of Claims filed and/or approved by the Court, specifically, Claims 2 and 18.
2. The Debtor has not demonstrated that all tax returns have been filed as required by §1325(a)(9), specifically, 2020 taxes for West Virginia.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 16<sup>th</sup> day of January 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

NICHOLAS G PLATT, ESQUIRE  
MOONEY LAW  
230 YORK STREET  
HANOVER, PA 17331-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee